

The Burgess Law Group

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May 20, 2022

Sent Via Email and Regular Mail

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RE: Lake, et al. v. Hobbs., et al, 22-cv-00677-DMF

12(b)(6) Motion to Dismiss Meet and Confer & Rule 11 Notice

Dear Messrs. Parker, Olsen and Dershowitz,

This firm represents the members of the Maricopa County Board of Supervisors, in their official capacities, (the "County") with respect to the above-referenced lawsuit. Pursuant to the court's May 12, 2022, Order, this letter serves as notice of the County's intention to file a 12(b)(6) motion to dismiss. In addition, this letter provides notice that you and your law firms are in violation of Rule 11(b)(2) & (3), Fed. R. Civ. P. As detailed below, this case is frivolous. It is devoid of any factual or legal bases and the court is precluded from granting the relief requested. Although we are willing to discuss this matter with you, because of the nature and magnitude of the Amended Complaint's defects, it is our position that they cannot be cured by amendment. As such, the County requests your clients voluntarily dismiss this suit immediately. Absent immediate dismissal, in addition to filing a motion to dismiss, our client will seek Rule 11 sanctions, including attorneys' fees and costs.

The Amended Complaint seeks an injunction requiring two things prior to the November 8, 2022, midterm general election: (1) votes to be "cast by hand on verifiable paper ballots that maintains (sic) voter anonymity" and (2) that votes "be counted by human beings, not by machines" with "transparency" and "observable by the public". (Am. Cmplt ¶7). With respect to your clients' request for an injunction requiring paper ballots or as stated in Paragraph 153, "an election conducted by paper ballots, as an alternative to the current framework," it is difficult for one to

imagine a larger waste of judicial resources and taxpayer money or a more egregious violation of Rule 11(b).

All votes tabulated in Maricopa County and every other County in Arizona are cast on paper ballots - Arizona has always used paper ballots. *See*, A.R.S. § 16-462 (primary election ballots "shall be printed"); A.R.S. § 16-468(2) ("Ballots shall be printed in plain clear type in black ink, and for a general election, on clear white materials"); A.R.S. § 16-502 (general election ballots "shall be printed with black ink on white paper")¹. It is inconceivable that your clients are not aware of this fact because both have voted on paper ballots for nearly 20 years. *See* Ex. A, Finchem and Lake voting history, respectively. In fact, both Mr. Finchem and Ms. Lake have received a paper ballot in the mail and voted early by mail in numerous elections since 2004. *Id.* Moreover, Mr. Finchem has been elected to office by voters using paper ballots that were tabulated by machines four times since 2014. Whether you failed to speak to your clients before filing this action or failed to do the minimum reasonable inquiry required, the point remains the same – your inclusion of this request for injunctive relief violates Rule 11 and we intend to seek sanctions if you do not withdraw it immediately.

Plaintiffs' remaining request for injunctive relief fares no better. The law is well-settled, Federal courts will not enjoin a state's election laws in the period close to an election. *Purcell* v. *Gonzalez*, 549 U. S. 1 (2006) (*per curiam*). Indeed, "the *Purcell* principle—reflects a bedrock tenet of election law: When an election is close at hand, the rules of the road must be clear and settled. Late judicial tinkering with election laws can lead to disruption and to unanticipated and unfair consequences for candidates, political parties, and voters, among others." *Merrill v. Milligan*, 595 U.S. , 142 S. Ct. 879, 880 (2022) (Kavanaugh, J., concurring).

With fewer than six months before the general election and fewer than three months before the August primary, your clients seek an injunction completely replacing the entire ballot tabulation process authorized by Arizona law since at least 1979. See Laws 1979, ch. 209 (34th Leg., 1st Reg. Sess.). An injunction forcing the County to count all the ballots by hand in the midterm election would disrupt the County's ability to conduct the election properly and consistent with federal and state law. Moreover, the County has already released its election plan on which the citizens Maricopa County rely voting related information. of for and https://recorder.maricopa.gov/site/pdf/FINAL%20-%202022%20Elections%20Plan.pdf. among other things, it already has leased and contracted for polling location space, ballots are being printed, poll workers are being hired and trained and costs have been budgeted. Under these circumstances, the *Purcell* principle precludes the court from granting the requested injunctive relief.

Further, the allegation that, "[t]he recent hand count in Maricopa County, the second largest voting jurisdiction in the United States, offers Defendant Hobbs a proof-of-concept and a superior alternative to relying on corruptible electronic voting systems," is demonstrably false. (Am.Cmplt.

¹ The only exception to the paper ballot requirement in Arizona is the exception made for voters who are blind or visually impaired. A.R.S. § 16-442.01. Those voters may use accessible voting devices. A.R.S. § 16-442.01. Notwithstanding, Arizona law requires that every accessible voting device must produce a paper ballot or voter verifiable paper audit trail. Elections Procedures Manual (2019) at 80.

¶ 155). The Cyber Ninjas counted only two contests (of more than 60 on each ballot)², it took them more than three months³, it cost millions of dollars⁴, they claim that they went bankrupt as a result⁵, and the hand count results were so problematic, the Arizona Senate was forced to purchase paper-counting machines in an attempt to reconcile the hand counts' botched numbers⁶. The Cyber Ninjas' bungled hand count demonstrates exactly why the court cannot, at any time, but especially six months before the midterm general election, grant your clients' request to preclude machine counting of ballots in Maricopa County.

Because the relief you request is neither necessary (Maricopa County uses paper ballots) nor legally possible (the midterm general election is too close), there is no good faith basis for your clients to continue pursuing their requests for injunctive relief. For these reasons alone, they must dismiss this case.

Even if the requested relief were needed or possible, Plaintiffs' underlying legal claims fail as a matter of law. The constitutional claims are barred by Section 1983's two-year statute of limitations and the doctrine of laches⁷. As addressed above, for more than 40 years the Arizona legislature has authorized the use of machines to count Arizonan's paper ballots. In addition, it is clear that your clients' alleged distrust of the machine counting process began many years ago, although they've never mentioned it before. Page after page of the Amended Complaint alleges it has been widely known for nearly 20 years that machine counting of ballots is allegedly unreliable and prone to hacking and manipulation. Specifically, Paragraph 73 alleges, "credible allegations of electronic machine 'glitches' that materially impacted races began to emerge in 2002". The County disputes these unfounded assertions regarding the unreliability of machine counting and that the Amended Complaint contains a single plausible factual allegation that supports the existence of these vulnerabilities⁸ in Maricopa County. Nevertheless, the fact remains that your

² Cyber Ninjas' Report, Vol. III (September 24, 2021) at 2-3, available at https://www.azsenaterepublicans.com/cyber-ninjas-report.

³ Cyber Ninjas' Report, Vol. II (September 24, 2021) at 4, available at https://www.azsenaterepublicans.com/cyber-ninjas-report.

⁴ Jerod MacDonald-Evoy, "'Audit' records show Cyber Ninjas went deep into debt, despite pro-Trump donations," *AZMirror* (May 11, 2022), *available at* https://www.azmirror.com/blog/audit-records-show-cyber-ninjas-went-deep-into-debt-despite-pro-trump-donations/.

⁵ Erin Brady, "Cyber Ninjas to File for Bankruptcy, CEO Plans to Start New Firm with Same Employees," *Newsweek* (January 7, 2022), *available at* https://www.newsweek.com/cyber-ninjas-file-bankruptcy-ceo-plans-start-new-firm-same-employees-1667113.

⁶ See Randy Pullen Report (August 13, 2021), available at https://www.azsenaterepublicans.com/pullen-report (explaining that the Arizona Senate acquired tabulation machines to count the paper ballots in an attempt to 'check' the results of the hand-count performed by Cyber Ninjas).

⁷ "In the context of election matters, the laches doctrine seeks to prevent dilatory conduct and will bar a claim if a party's unreasonable delay prejudices the opposing party or the administration of justice." *Arizona Libertarian Party v. Reagan*, 189 F. Supp. 3d 920, 922–23 (D. Ariz. 2016).

⁸ Indeed, the Special Master hired by the Arizona Senate and Maricopa County confirmed that Maricopa County uses an air-gapped system that "provides the necessary isolation from the public Internet, and in fact is in a self-contained environment" with "no wired or wireless connections in or out of the Ballot Tabulation Center" so that "the election network and election devices cannot connect to the public Internet." John Shadegg, Answers to Senate Questions Regarding Maricopa County Election Network: Arizona 2020

clients unreasonably delayed bringing these claims for years and this delay clearly prejudices the County given the injunctive relief requested and the proximity to the general election, so the claims are time-barred.

Further, the constitutional claims and declaratory action fail because the relief requested would violate the Elections Clause of the U.S. Constitution. (U.S. Const., art I, 4). This clause gives state legislatures the authority to determine how congressional elections are to be administered, absent Congressional action. There is no federal regulation requiring votes be counted by hand. Arizona's legislature has, consistent with its Constitutional obligations and authority, legislated the manner in which votes are counted in Arizona - by electronic tabulation machines, followed by a 2% hand count audit. A.R.S. §§ 16-441 – 450 (providing the statutory framework and authorization for the use of tabulation machines for Arizona's elections); -602(B) (mandating the 2% hand count audit following every primary, special, or general election). Finally, there is no private right of action pursuant to A.R.S. § 11-251. It simply does not exist.

In violation of your Rule 11 obligations, the Amended Complaint is riddled with objectively-provable false and misleading misstatements of fact about substantive matters – most, if not all, are disproven by public documents of which the court may take judicial notice. In addition to those addressed above, and just by way of example, Paragraph 2 alleges that "untested and unverified electronic voting machines" are used in Maricopa County and Arizona. Not so. The tabulation machines used in Arizona elections were subjected to testing and verification prior to being certified for use, as required by federal and state law. A.R.S. § 16-442; 52 U.S.C. § 20971. Both the independent, bipartisan Election Assistance Commission and the Arizona Secretary of State's Equipment Certification Committee certified them. These machines are tested again, both before and after elections, to verify that they accurately read paper ballots. A.R.S. § 16-449 (pre-election logic and accuracy test); Elections Procedures Manual (109) at 235 (post-election logic and accuracy test). Further, the accuracy of the tabulation machines is verified via the required 2% hand-count audit conducted by representatives of the political parties after elections. A.R.S. § 16-602(B). The allegation that the tabulation machines used in Arizona elections are untested and unverified is patently false.

In summary, the Amended Complaint asks the Court to order Maricopa County and Arizona to allow people to vote by paper ballot when that is already the law in Arizona. It seeks an order requiring ballots to be counted according to the Plaintiffs' preferences, despite the fact that the United States Constitution authorizes the Arizona legislature to determine how Arizona ballots are counted. It also asks for injunctive relief that is barred by the well-established *Purcell* principle. As if that were not enough, it is premised on a statutory hook for which the statute of limitations has expired and it is barred by laches; and it seeks relief pursuant to a statute that provides no private right of action. Finally, the bulk of the allegations in the Amended Complaint are either demonstrably false or have nothing to do with the way elections are conducted in the State of Arizona. As such, the Amended Complaint fails as a matter of law. The County therefore requests that you discuss this with your clients, and further requests that your clients voluntarily dismiss this action immediately, but certainly no later than June 1, 2022 (the responsive pleading deadline

in this matter). If they do not do so, we will file a motion to dismiss and the County will seek its attorney's fees pursuant to 42 U.S.C. § 1988, which provides that the court may award fees to "the prevailing party" in cases brought pursuant to Section 1983. Additionally, the County will seek sanctions, including attorney's fees, pursuant to Rule 11.

Because your clients are candidates for the party nomination in the August 2, 2022 elections for the offices of governor and secretary of state in Arizona, we assume they will carefully consider the facts and legal analysis provided and reconsider pursuing this matter. As indicated, feel free to contact me if you would like to discuss this further.

Sincerely,

Emily Craiger, Esq. For the Firm

EXHIBIT "A"

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Voted File Report

Voter ID	<u>Name</u>	Address		<u>Status</u>	Date of Registration	
2002542	LAKE, KARI ANN	5225 N 31ST PL 850	016	A	07/18/2000	
Election Number:	1383	House Number:	5225	Party:	REP	
Election Type:	J	House Number Suff	ix:	Precinct:	0048	
Election Date:	11/02/2021	Street Direction:	N	CPC:	6793	
First Name:	KARI	Street Name:	31ST	City District:	P6	
Middle Name:	L	Street Type:	PL	School District:	038	
Last Name:	HALPERIN	Street Suffix:		Early Voter Status:	R	
Telephone:	(602) 430-6278	Unit Number:		Ballot Rcv from USI	PS: 10/22/2021	
		City:	PHOENIX	Primary Ballot:		
		Zip Code:	85016	Provisional:		
Election Number:	1377	House Number:	5225	Party:	REP	
Election Type:	G	House Number Suff	fix:	Precinct:	0048	
Election Date:	11/03/2020	Street Direction:	N	CPC:	0048	
First Name:	KARI	Street Name:	31ST	City District:	P6	
Middle Name:	L	Street Type:	PL	School District:	038	
Last Name:	HALPERIN	Street Suffix:		Early Voter Status:	P	
Telephone:	(602) 430-6278	Unit Number:		Ballot Rev from USPS:		
		City:	PHOENIX	Primary Ballot:		
		Zip Code:	85016	Provisional:		
Election Number:	1376	House Number:	5225	Party:	REP	
Election Type:	P	House Number Suff	fix:	Precinct:	0048	
Election Date:	08/04/2020	Street Direction:	N	CPC:	0048	
First Name:	KARI	Street Name:	31ST	City District:	P6	
Middle Name:	L	Street Type:	PL	School District:	038	
Last Name:	HALPERIN	Street Suffix:		Early Voter Status:	R	
Telephone:	(602) 430-6278	Unit Number:		Ballot Rev from USPS:07/16/2020		
		City:	PHOENIX	Primary Ballot:	REP	
		Zip Code:	85016	Provisional:		
Election Number:	1349	House Number:	5225	Party:	REP	
Election Type:	J	House Number Suff	fix:	Precinct:	6581	
Election Date:	11/05/2019	Street Direction:	N	CPC:	6581	
First Name:	KARI	Street Name:	31ST	City District:	P6	
Middle Name:	L	Street Type:	PL	School District:	038	
Last Name:	HALPERIN	Street Suffix:		Early Voter Status:	R	
Telephone:	(602) 430-6278	Unit Number:		Ballot Rev from USPS:10/22/2019		
-	. ,	City:	PHOENIX	Primary Ballot:		
		Zip Code:	85016	Provisional:		

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Voter ID	<u>Name</u>	Address		Status	Date of Registration
2002542	LAKE, KARI ANN	5225 N 31ST PL 850	016	A	07/18/2000
Election Number:	1341	House Number:	5225	Party:	REP
Election Type:	G	House Number Suff		Precinct:	0048
Election Date:	11/06/2018	Street Direction:	N	CPC:	0048
First Name:	KARI	Street Name:	31ST	City District:	P6
Middle Name:	L	Street Type:	PL	School District:	038
Last Name:	HALPERIN	Street Suffix:		Early Voter Status:	R
Telephone:	(602) 430-6278	Unit Number:		Ballot Rev from USI	PS: 10/25/2018
		City:	PHOENIX	Primary Ballot:	
		Zip Code:	85016	Provisional:	
Election Number:	1339	House Number:	5225	Party:	REP
Election Type:	P	House Number Suff	ïx:	Precinct:	0048
Election Date:	08/28/2018	Street Direction:	N	CPC:	0048
First Name:	KARI	Street Name:	31ST	City District:	P6
Middle Name:	L	Street Type:	PL	School District:	038
Last Name:	HALPERIN	Street Suffix:		Early Voter Status:	R
Telephone:	(602) 430-6278	Unit Number:		Ballot Rev from USPS:08/17/2018	
		City:	PHOENIX	Primary Ballot:	REP
		Zip Code:	85016	Provisional:	
Election Number:	1326	House Number:	6602	Party:	REP
Election Type:	J	House Number Suff	ïx:	Precinct:	6462
Election Date:	11/07/2017	Street Direction:	N	CPC:	6462
First Name:	KARI	Street Name:	36TH	City District:	P6
Middle Name:	L	Street Type:	ST	School District:	014
Last Name:	HALPERIN	Street Suffix:		Early Voter Status:	R
Telephone:	(602) 257-1234	Unit Number:		Ballot Rev from USI	PS: 10/20/2017
		City:	PHOENIX	Primary Ballot:	
		Zip Code:	85018	Provisional:	
Election Number:	1301	House Number:	6602	Party:	REP
Election Type:	G	House Number Suff	ïx:	Precinct:	0379
Election Date:	11/08/2016	Street Direction:	N	CPC:	0379
First Name:	KARI	Street Name:	36TH	City District:	P6
Middle Name:	L	Street Type:	ST	School District:	014
Last Name:	HALPERIN	Street Suffix:		Early Voter Status:	R
Telephone:	(602) 257-1234	Unit Number:		Ballot Rev from USI	PS: 10/28/2016
-	` '	City:	PHOENIX	Primary Ballot:	
		Zip Code:	85018	Provisional:	

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For Voter ID: 2002542

Voter ID	<u>Name</u>	<u>Address</u>		Status	Date of Registration
2002542	LAKE, KARI ANN	5225 N 31ST PL 850	016	A	07/18/2000
Election Number:	1300	House Number:	6602	Party:	REP
Election Type:	P	House Number Suff	fix:	Precinct:	0379
Election Date:	08/30/2016	Street Direction:	N	CPC:	0379
First Name:	KARI	Street Name:	36TH	City District:	P6
Middle Name:	L	Street Type:	ST	School District:	014
Last Name:	HALPERIN	Street Suffix:		Early Voter Status:	R
Telephone:	(602) 257-1234	Unit Number:		Ballot Rcv from USP	S:08/24/2016
		City:	PHOENIX	Primary Ballot:	REP
		Zip Code:	85018	Provisional:	
Election Number:	1299	House Number:	6602	Party:	REP
Election Type:	J	House Number Suff	fix:	Precinct:	6389
Election Date:	05/17/2016	Street Direction:	N	CPC:	6389
First Name:	KARI	Street Name:	36TH	City District:	P6
Middle Name:	L	Street Type:	ST	School District:	014
Last Name:	HALPERIN	Street Suffix:		Early Voter Status:	R
Telephone:	(602) 257-1234	Unit Number:		Ballot Rcv from USPS:04/29/2016	
		City:	PHOENIX	Primary Ballot:	
		Zip Code:	85018	Provisional:	
Election Number:	1290	House Number:	6602	Party:	REP
Election Type:	C	House Number Suff	fix:	Precinct:	7900
Election Date:	03/22/2016	Street Direction:	N	CPC:	7900
First Name:	KARI	Street Name:	36TH	City District:	P6
Middle Name:	L	Street Type:	ST	School District:	014
Last Name:	HALPERIN	Street Suffix:		Early Voter Status:	R
Telephone:	(602) 257-1234	Unit Number:		Ballot Rcv from USP	S:03/02/2016
		City:	PHOENIX	Primary Ballot:	
		Zip Code:	85018	Provisional:	
Election Number:	1280	House Number:	6602	Party:	REP
Election Type:	J	House Number Suff	fix:	Precinct:	6134
Election Date:	11/03/2015	Street Direction:	N	CPC:	6134
First Name:	KARI	Street Name:	36TH	City District:	P6
Middle Name:	L	Street Type:	ST	School District:	014
Last Name:	HALPERIN	Street Suffix:		Early Voter Status:	R
Telephone:	(602) 257-1234	Unit Number:		Ballot Rcv from USP	S:10/27/2015
	•	City:	PHOENIX	Primary Ballot:	
		Zip Code:	85018	Provisional:	

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Election Number:	1256	House Number:	6602	Party:	REP	
Election Type:	G	House Number Suff	ix:	Precinct:	0379	
Election Date:	11/04/2014	Street Direction:	N	CPC:	0379	
First Name:	KARI	Street Name:	36TH	City District:	P6	
Middle Name:	L	Street Type:	ST	School District:	314	
Last Name:	HALPERIN	Street Suffix:		Early Voter Status:	R	
Telephone:	(602) 257-1234	Unit Number:		Ballot Rcv from USP	S:10/29/2014	
		City:	PHOENIX	Primary Ballot:		
		Zip Code:	85018	Provisional:		
Election Number:	1255	House Number:	6602	Party:	REP	
Election Type:	P	House Number Suff	ix:	Precinct:	0379	
Election Date:	08/26/2014	Street Direction:	N	CPC:	0379	
First Name:	KARI	Street Name:	36TH	City District:	P6	
Middle Name:	L	Street Type:	ST	School District:	314	
Last Name:	HALPERIN	Street Suffix:		Early Voter Status:	R	
Telephone:	(602) 257-1234	Unit Number:		Ballot Rcv from USPS:08/11/2014		
		City:	PHOENIX	Primary Ballot:	REP	
		Zip Code:	85018	Provisional:		
Election Number:	1246	House Number:	6602	Party:	REP	
Election Type:	J	House Number Suff	ix:	Precinct:	5761	
Election Date:	11/05/2013	Street Direction:	N	CPC:	5761	
First Name:	KARI	Street Name:	36TH	City District:	P6	
Middle Name:	L	Street Type:	ST	School District:	314	
Last Name:	HALPERIN	Street Suffix:		Early Voter Status:	R	
Telephone:	(602) 257-1234	Unit Number:		Ballot Rcv from USP	S:10/17/2013	
		City:	PHOENIX	Primary Ballot:		
		Zip Code:	85018	Provisional:		
Election Number:	1221	House Number:	6602	Party:	REP	
Election Type:	G	House Number Suff	ix:	Precinct:	0379	
Election Date:	11/06/2012	Street Direction:	N	CPC:	0379	
First Name:	KARI	Street Name:	36TH	City District:	P6	
Middle Name:	L	Street Type:	ST	School District:	314	
Last Name:	HALPERIN	Street Suffix:		Early Voter Status:	R	
Telephone:	(602) 257-1234	Unit Number:		Ballot Rev from USP	S:10/23/2012	
		City:	PHOENIX	Primary Ballot:		
		Zip Code:	85018	Provisional:		

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2002542	LAKE, KARI ANN	5225 N 31ST PL 8501	16	A	07/18/2000
Election Number:	1220	House Number:	6602	Party:	REP
Election Type:	P	House Number Suffi	x:	Precinct:	0379
Election Date:	08/28/2012	Street Direction:	N	CPC:	0379
First Name:	KARI	Street Name:	36TH	City District:	P6
Middle Name:	L	Street Type:	ST	School District:	314
Last Name:	HALPERIN	Street Suffix:		Early Voter Status:	R
Telephone:	(602) 257-1234	Unit Number:		Ballot Rcv from USP	S:08/23/2012
		City:	PHOENIX	Primary Ballot:	REP
		Zip Code:	85018	Provisional:	
Election Number:	1193	House Number:	6602	Party:	DEM
Election Type:	J	House Number Suffi	x:	Precinct:	5061
Election Date:	11/08/2011	Street Direction:	N	CPC:	5061
First Name:	KARI	Street Name:	36TH	City District:	P6
Middle Name:	LAKE	Street Type:	ST	School District:	314
Last Name:	HALPERIN	Street Suffix:		Early Voter Status:	R
Telephone:	(602) 430-6278	Unit Number:		Ballot Rcv from USPS:10/21/2011	
		City:	PHOENIX	Primary Ballot:	
		Zip Code:	85018	Provisional:	
Election Number:	1167	House Number:	6602	Party:	DEM
Election Type:	G	House Number Suffi	x:	Precinct:	0409
Election Date:	11/02/2010	Street Direction:	N	CPC:	0409
First Name:	KARI	Street Name:	36TH	City District:	P6
Middle Name:	LAKE	Street Type:	ST	School District:	314
Last Name:	HALPERIN	Street Suffix:		Early Voter Status:	R
Telephone:	(602) 430-6278	Unit Number:		Ballot Rcv from USP	S:10/27/2010
		City:	PHOENIX	Primary Ballot:	
		Zip Code:	85018	Provisional:	
Election Number:	1166	House Number:	6602	Party:	DEM
Election Type:	P	House Number Suffi	x:	Precinct:	0409
Election Date:	08/24/2010	Street Direction:	N	CPC:	0409
First Name:	KARI	Street Name:	36TH	City District:	P6
Middle Name:	LAKE	Street Type:	ST	School District:	314
Last Name:	HALPERIN	Street Suffix:		Early Voter Status:	R
Telephone:	(602) 430-6278	Unit Number:		Ballot Rev from USP	S:08/19/2010
	•	City:	PHOENIX	Primary Ballot:	DEM
		Zip Code:	85018	Provisional:	

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Voted File Report

Voter ID	<u>Name</u>	Address		<u>Status</u>	Date of Registration
2002542	LAKE, KARI ANN	5225 N 31ST PL 850	016	A	07/18/2000
Election Number:	1163	House Number:	6602	Party:	DEM
Election Type:	J	House Number Suff	ix:	Precinct:	6495
Election Date:	05/18/2010	Street Direction:	N	CPC:	6495
First Name:	KARI	Street Name:	36TH	City District:	P6
Middle Name:	LAKE	Street Type:	ST	School District:	314
Last Name:	HALPERIN	Street Suffix:		Early Voter Status:	R
Telephone:	(602) 430-6278	Unit Number:		Ballot Rcv from USP	S:04/29/2010
		City:	PHOENIX	Primary Ballot:	
		Zip Code:	85018	Provisional:	
Election Number:	1154	House Number:	6602	Party:	DEM
Election Type:	J	House Number Suff	fix:	Precinct:	5961
Election Date:	03/09/2010	Street Direction:	N	CPC:	5961
First Name:	KARI	Street Name:	36TH	City District:	P6
Middle Name:	LAKE	Street Type:	ST	School District:	314
Last Name:	HALPERIN	Street Suffix:		Early Voter Status:	R
Telephone:	(602) 430-6278	Unit Number:		Ballot Rcv from USPS:03/01/2010	
		City:	PHOENIX	Primary Ballot:	
		Zip Code:	85018	Provisional:	
Election Number:	1139	House Number:	6602	Party:	DEM
Election Type:	J	House Number Suff	iix:	Precinct:	5671
Election Date:	11/03/2009	Street Direction:	N	CPC:	5671
First Name:	KARI	Street Name:	36TH	City District:	P6
Middle Name:	LAKE	Street Type:	ST	School District:	314
Last Name:	HALPERIN	Street Suffix:		Early Voter Status:	S
Telephone:	(602) 430-6278	Unit Number:		Ballot Rcv from USP	S:
		City:	PHOENIX	Primary Ballot:	
		Zip Code:	85018	Provisional:	
Election Number:	1098	House Number:	6602	Party:	DEM
Election Type:	G	House Number Suff	fix:	Precinct:	0409
Election Date:	11/04/2008	Street Direction:	N	CPC:	0409
First Name:	KARI	Street Name:	36TH	City District:	P6
Middle Name:	LAKE	Street Type:	ST	School District:	314
Last Name:	HALPERIN	Street Suffix:		Early Voter Status:	R
Telephone:	(602) 430-6278	Unit Number:		Ballot Rev from USPS:10/22/2008	
		City:	PHOENIX	Primary Ballot:	
		Zip Code:	85018	Provisional:	

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Voter ID	<u>Name</u>	<u>Address</u>		Status	Date of Registration
2002542	LAKE, KARI ANN	5225 N 31ST PL 850	016	A	07/18/2000
Election Number:	1097	House Number:	6602	Party:	DEM
Election Type:	P	House Number Suff	fix:	Precinct:	0409
Election Date:	09/02/2008	Street Direction:	N	CPC:	0409
First Name:	KARI	Street Name:	36TH	City District:	P6
Middle Name:	LAKE	Street Type:	ST	School District:	314
Last Name:	HALPERIN	Street Suffix:		Early Voter Status:	R
Telephone:	(602) 430-6278	Unit Number:		Ballot Rcv from USP	S:09/01/2008
		City:	PHOENIX	Primary Ballot:	DEM
		Zip Code:	85018	Provisional:	
Election Number:	1077	House Number:	6602	Party:	DEM
Election Type:	C	House Number Suff	fix:	Precinct:	7368
Election Date:	02/05/2008	Street Direction:	N	CPC:	7368
First Name:	KARI	Street Name:	36TH	City District:	P6
Middle Name:	LAKE	Street Type:	ST	School District:	314
Last Name:	HALPERIN	Street Suffix:		Early Voter Status:	R
Telephone:	(602) 430-6278	Unit Number:		Ballot Rcv from USPS:01/25/2008	
•	· /	City:	PHOENIX	Primary Ballot:	
		Zip Code:	85018	Provisional:	
Election Number:	1007	House Number:	6602	Party:	REP
Election Type:	G	House Number Suff	fix:	Precinct:	0409
Election Date:	11/07/2006	Street Direction:	N	CPC:	0409
First Name:	KARI	Street Name:	36TH	City District:	P6
Middle Name:	L	Street Type:	ST	School District:	314
Last Name:	HALPERIN	Street Suffix:		Early Voter Status:	R
Telephone:	(602) 257-1234	Unit Number:		Ballot Rcv from USP	S:11/01/2006
	· /	City:	PHOENIX	Primary Ballot:	
		Zip Code:	85018	Provisional:	
Election Number:	892	House Number:	6602	Party:	REP
Election Type:	G	House Number Suff	iix:	Precinct:	0409
Election Date:	11/02/2004	Street Direction:	N	CPC:	0409
First Name:	KARI	Street Name:	36TH	City District:	P6
Middle Name:	L	Street Type:	ST	School District:	314
Last Name:	HALPERIN	Street Suffix:		Early Voter Status:	R
Telephone:	(602) 257-1234	Unit Number:		Ballot Rev from USP	
-	` '	City:	PHOENIX	Primary Ballot:	
		Zip Code:	85018	Provisional:	

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Voted File Report

Voter ID	<u>Name</u>	Address		<u>Status</u>	Date of Registration
2002542	LAKE, KARI ANN	5225 N 31ST PL 850	16	A	07/18/2000
Election Number:	891	House Number:	6602	Party:	REP
Election Type:	P	House Number Suffi	ix:	Precinct:	0409
Election Date:	09/07/2004	Street Direction:	N	CPC:	0409
First Name:	KARI	Street Name:	36TH	City District:	P6
Middle Name:	L	Street Type:	ST	School District:	314
Last Name:	HALPERIN	Street Suffix:		Early Voter Status:	R
Telephone:	(602) 257-1234	Unit Number:		Ballot Rev from USP	S:
		City:	PHOENIX	Primary Ballot:	
		Zip Code:	85018	Provisional:	
Election Number:	779	House Number:	6602	Party:	REP
Election Type:	G	House Number Suffi	ix:	Precinct:	0409
Election Date:	11/05/2002	Street Direction:	N	CPC:	0409
First Name:	KARI	Street Name:	36TH	City District:	P3
Middle Name:	L	Street Type:	ST	School District:	314
Last Name:	HALPERIN	Street Suffix:		Early Voter Status:	R
Telephone:	(602) 257-1234	Unit Number:		Ballot Rcv from USPS:	
	•	City:	PHOENIX	Primary Ballot:	
		Zip Code:	85018	Provisional:	
Election Number:	769	House Number:	6602	Party:	REP
Election Type:	P	House Number Suffi	ix:	Precinct:	0409
Election Date:	09/10/2002	Street Direction:	N	CPC:	0409
First Name:	KARI	Street Name:	36TH	City District:	P3
Middle Name:	L	Street Type:	ST	School District:	314
Last Name:	HALPERIN	Street Suffix:		Early Voter Status:	R
Telephone:	(602) 257-1234	Unit Number:		Ballot Rcv from USP	S:
		City:	PHOENIX	Primary Ballot:	
		Zip Code:	85018	Provisional:	
Election Number:	669	House Number:	515	Party:	REP
Election Type:	G	House Number Suffi	ix:	Precinct:	0361
Election Date:	11/07/2000	Street Direction:	W	CPC:	0361
First Name:	KARI	Street Name:	PALO VERDE	City District:	P4
Middle Name:	L	Street Type:	DR	School District:	438
Last Name:	HALPERIN	Street Suffix:		Early Voter Status:	P
Telephone:		Unit Number:		Ballot Rev from USP	S:
-		City:	PHOENIX	Primary Ballot:	
		Zip Code:	85013	Provisional:	

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Voted File Report

Voter ID	<u>Name</u>	<u>Address</u>		Status	Date of Registration
2002542	LAKE, KARI ANN	5225 N 31ST PL 850	16	A	07/18/2000
Election Number:	666 B	House Number:	515	Party:	REP
Election Type: Election Date:	P	House Number Suffi Street Direction:	X: W	Precinct: CPC:	0361
First Name:	09/12/2000 KARI	Street Name:	w PALO VERDE	City District:	0361 P4
Middle Name:	L	Street Type:	DR	School District:	438
Last Name:	HALPERIN	Street Suffix:		Early Voter Status:	P
Telephone:		Unit Number:		Ballot Rcv from USP	S:
		City:	PHOENIX	Primary Ballot:	
		Zip Code:	85013	Provisional:	

Voting History 1740143 - FINCHEM, MARK W

#	Election Name	Voted Early?
126	2002 GENERAL ELECTION	
147	2004 PRIMARY ELECTION	
148	2004 GENERAL ELECTION	Yes
172	2006 GENERAL ELECTION	Yes
189	2007 CITY OF TUCSON GENERAL	
193	2008 PRIMARY ELECTION	Yes
194	2008 GENERAL ELECTION	Yes
208	NOVEMBER 2009 CONSOLIDATED ELECTIONS	Yes
209	2010 ORO VALLEY PRIMARY ELECTION	Yes
213	2010 SPECIAL STATE SALES TAX ELECTION	Yes
214	2010 PRIMARY ELECTION	Yes
215	2010 GENERAL ELECTION	Yes
232	2012 PRESIDENTIAL PREFERENCE ELECTION	Yes
233	2012 ORO VALLEY PRIMARY ELECTION	Yes
234	2012 SPECIAL CONGRESSIONAL PRIMARY	Yes
236	2012 SPECIAL CONGRESSIONAL GENERAL	Yes
237	2012 PRIMARY ELECTION	Yes
238	2012 GENERAL ELECTION	Yes
252	2014 PRIMARY ELECTION	Yes
253	2014 GENERAL ELECTION	Yes
257	2015 PIMA COUNTY BOND ELECTION	Yes
258	2016 PRESIDENTIAL PREFERENCE ELECTION	Yes
259	2016 SCHOOL FUNDING ELECTION	Yes
260	2016 PRIMARY ELECTION	Yes
261	2016 GENERAL ELECTION	Yes
265	2017 TOWN OF ORO VALLEY SPECIAL ELECTION	Yes
269	2018 PRIMARY ELECTION	Yes
270	2018 GENERAL ELECTION	Yes
274	2019 CONSOLIDATED SCHOOL/FIRE ELECTION	Yes
276	2020 PRIMARY ELECTION	Yes
277	2020 GENERAL ELECTION	Yes